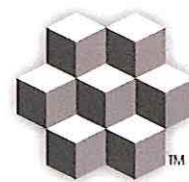


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 Dodge City
 Blue Valley Telephone Co., Inc.
 Home
 Columbus Telephone Company, Inc.
 Columbus
 Council Grove Telephone Company
 Council Grove
 Craw-Kan Telephone Cooperative, Inc.
 Girard
 Cunningham Telephone Co., Inc.
 Glen Elder
 Elkhart Telephone Company, Inc.
 Elkhart
 Golden Bell Telephone Association
 Rush Center
 Gorham Telephone Company, Inc.
 Gorham
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 Holyrood
 Haviland Telephone Company, Inc.
 Haviland
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 Caldwell
 LaHarpe Telephone Company, Inc.
 LaHarpe
 Madison Telephone Company, Inc.
 Madison
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 Moundridge Telephone Company, Inc.
 Moundridge
 Mutual Telephone Company
 Little River
 Peoples Telecommunications, Inc.
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 Wamego Telecommunications Company, Inc.
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October 19, 2011

Michael J. Copps, Commissioner
 Federal Communication Commission
 445 12th Street SW
 Washington, DC 20554

Dear Commissioner Copps:

The Kansas Rural Independent Telephone Companies are deeply concerned with recent developments at the FCC. Over the past several days, major aspects of the Commission's proposed universal service fund/intercarrier compensation reform order, scheduled for vote on October 27, 2011, have been discussed with representatives of the rural telecommunication industry. Although discussion continues, it is apparent that the FCC is determined to ignore clear and substantial evidence of harm and move down a "reform" path that will devastate rural America. The concepts in the proposed order would jeopardize existing service vital to rural communities and economies while doing little to assure timely deployment of comparable services in unserved areas.

The proposed order currently circulating at the FCC would:

- Fail to advance the critical objective of expanded broadband deployment in rural America;
- Aggravate rather than resolve regulatory and economic uncertainty;
- Reverse rural progress in job retention and creation;
- Undermine economic development;
- Contravene the Congressional mandate for consumers to have access to reasonably comparable rates and services.

This is not the reform path the FCC should take.

The Kansas Rural Independent Telephone Companies urge the Commission to adopt the Consensus Framework for universal service reform as advanced by the nation's communications service providers. Among the proposals under consideration, the Consensus Framework holds the best prospect for achieving the objective of nationwide broadband availability and affordability. The Framework's comprehensive approach and compromises will affect individual rural carriers in different ways and to different degrees, but it is clear this overall structure will be the least disruptive of existing broadband service on

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which rural communities and markets have come to rely. The Commission's drastic disruptions of this carefully balanced approach would result in untenable "reform" that would work at cross-purposes with public policy and the public interest.

The Consensus Framework, as proposed, will require significant adjustments by rural carriers, but will allow the carriers to maintain and enhance the high quality of service already available to the businesses, families, and institutions they serve. The framework justly recognizes the unique commitments and obligations under which rural carriers operate as they continue the transition from their historic role as voice service providers. It will further allow rural carriers to meet their significant responsibilities to the American taxpayers and assure that past commitment of public funds will continue to provide important public benefits. The Commission's proposed Order would instead threaten aggravation of the federal deficit through significant resulting defaults in government loans made and incurred in good faith.

It is likely no other segment of the telecommunications industry has demonstrated as great a tangible dedication to broadband service as have the rural carriers. Our proven performance, under responsible public supervision, has become a cornerstone of a broadband-capable nation. We urge the Commission to recognize and support this singular record of performance. The Consensus Framework will honor and continue our nation's longstanding commitment to a communications system that makes opportunities available in urban and rural areas alike, even as the scope and importance of communications services continue to expand. We ask that you act in furtherance of that continuing vital commitment.

For the Kansas Rural Independent Telephone Companies,

Kendall S. Mikesell
 Chairman

Kansas Rural Independent Telephone Companies State Advocacy Committee
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